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Attorneys for Plaintiff
Natalie Gene Nolt

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NATALIE GENE NOLT,)	Case No.: 2:22-cv-01926-BNW
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER FOR THE AWARD AND
vs.)	PAYMENT OF ATTORNEY FEES
)	AND EXPENSES PURSUANT TO
KILOLO KIJAKAZI,)	THE EQUAL ACCESS TO JUSTICE
Acting Commissioner of Social)	ACT, 28 U.S.C. § 2412(d) AND
Security,)	COSTS PURSUANT TO 28 U.S.C. §
)	1920
Defendant.)	

TO THE HONORABLE BRENDA WEKSLER, MAGISTRATE JUDGE
OF THE DISTRICT COURT:

IT IS HEREBY STIPULATED, by and between the parties through their
undersigned counsel, subject to the approval of the Court, that Natalie Gene Nolt
be awarded attorney fees and expenses in the amount of FOURTEEN HUNDRED

1 dollars (\$1,400.00) under the Equal Access to Justice Act (EAJA), 28 U.S.C. §
2 2412(d), and costs in the amount of zero dollars (\$0.00) under 28 U.S.C. § 1920.
3 This amount represents compensation for all legal services rendered on behalf of
4 Plaintiff by counsel in connection with this civil action, in accordance with 28
5 U.S.C. §§ 1920; 2412(d).

6 After the Court issues an order for EAJA fees to Natalie Gene Nolt, the
7 government will consider the matter of Natalie Gene Nolt's assignment of EAJA
8 fees to Marc Kalagian. The retainer agreement containing the assignment is
9 attached as exhibit 1. Pursuant to *Astrue v. Ratliff*, 130 S.Ct. 2521, 2529 (2010),
10 the ability to honor the assignment will depend on whether the fees are subject to
11 any offset allowed under the United States Department of the Treasury's Offset
12 Program. After the order for EAJA fees is entered, the government will determine
13 whether they are subject to any offset.

14 Fees shall be made payable to Natalie Gene Nolt, but if the Department of
15 the Treasury determines that Natalie Gene Nolt does not owe a federal debt, then
16 the government shall cause the payment of fees, expenses and costs to be made
17 directly to Law Offices of Lawrence D. Rohlfig, Inc., CPC, pursuant to the
18 assignment executed by Natalie Gene Nolt.¹ Any payments made shall be
19 delivered to Marc Kalagian.

20 This stipulation constitutes a compromise settlement of Natalie Gene Nolt's
21 request for EAJA attorney fees, and does not constitute an admission of liability on
22 the part of Defendant under the EAJA or otherwise. Payment of the agreed amount
23 shall constitute a complete release from, and bar to, any and all claims that Natalie
24

25 ¹ The parties do not stipulate whether counsel for the plaintiff has a cognizable lien
26 under federal law against the recovery of EAJA fees that survives the Treasury
Offset Program.

Gene Nolt and/or Marc Kalagian including Law Offices of Lawrence D. Rohlring, Inc., CPC may have relating to EAJA attorney fees in connection with this action.

This award is without prejudice to the rights of Marc Kalagian and/or the Law Offices of Lawrence D. Rohlring, Inc., CPC to seek Social Security Act attorney fees under 42 U.S.C. § 406(b), subject to the savings clause provisions of the EAJA.

DATE: April 19, 2023 Respectfully submitted,

LAW OFFICES OF LAWRENCE D. ROHLRING, INC., CPC

/s/ Marc V. Kalagian

BY: _____

Marc V. Kalagian
Attorney for plaintiff
NATALIE GENE NOLT

DATE: April 19, 2023

JASON M. FRIERSON
United States Attorney

/s/ Justin L. Martin

JUSTIN L. MARTIN
Special Assistant United States Attorney
Attorneys for Defendant
KILOLO KIJAKAZI, Acting Commissioner of
Social Security (Per e-mail authorization)

ORDER

Approved and so ordered:

DATE: April 24, 2023



THE HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 12631 East Imperial Highway, Suite C-115, Santa Fe Springs, California 90670.

On this day of April 20, 2023, I served the foregoing document described as STIPULATION FOR THE AWARD AND PAYMENT OF ATTORNEY FEES AND EXPENSES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT, 28 U.S.C. § 2412(d) AND COSTS PURSUANT TO 28 U.S.C. § 1920 on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Ms. Natalie Gene Nolt
910 Rocky Stone Ave.
N Las Vegas, NV 89081

I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Santa Fe Springs, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

I declare that I am employed in the office of a member of this court at whose direction the service was made.

Marc V. Kalagian
TYPE OR PRINT NAME

/s/ Marc V. Kalagian
SIGNATURE

**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:22-CV-01926-BNW**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on April 20, 2023.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system, except the plaintiff served herewith by mail.

/s/ Marc V. Kalagian

Marc V. Kalagian
Attorneys for Plaintiff